

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

600X463 3/12/07

JOHN BOYD et al.,)
Plaintiffs,) Case No. 07-cv-3007
v.))
AWB LIMITED and AWB (U.S.A.)))
LIMITED,))
Defendants.))

**MOTION TO ADMIT COUNSEL
PRO HAC VICE**

Pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Seth R. Gassman, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of:

Benjamin D. Brown
Cohen, Milstein, Hausfeld & Toll, PLLC
West Tower, Suite 500
1100 New York Avenue, NW
Washington, DC 20005
Tel: 202-408-4600
Fax: 202-408-4699
bbrown@cmht.com

Benjamin D. Brown is a member in good standing of the Bar of the State of California and the District of Columbia, and there are no pending disciplinary proceedings against him in any State or Federal court.

Dated: July 11, 2007

Respectfully submitted,


Seth R. Gassman (SG-8116)
Cohen, Milstein, Hausfeld & Toll, PLLC
150 East 52nd Street
Thirtieth Floor
New York, NY 10022
Tel: 212-838-7797
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UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

JOHN BOYD et al.,)
Plaintiffs,) Case No. 07-cv-3007
v.)
AWB LIMITED and AWB (U.S.A.))
LIMITED,)
Defendants.)
)

**AFFIDAVIT OF SETH R.
GASSMAN IN SUPPORT OF
MOTION TO ADMIT COUNSEL
PRO HAC VICE**

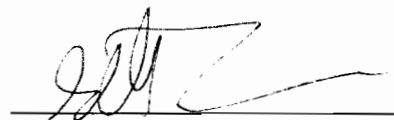
State of New York)
)
 County of New York) ss:

Seth R. Gassman, being duly sworn, hereby deposes and says as follows:

1. I am an associate at Cohen, Milstein, Hausfeld & Toll, PLLC, counsel for Plaintiffs in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiffs' motion to admit Benjamin D. Brown as counsel pro hac vice to represent Plaintiffs in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in April 2004. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Benjamin D. Brown since March 2007.
4. Mr. Brown is a partner at Cohen, Milstein, Hausfeld & Toll, PLLC, in Washington, DC.
5. I have found Mr. Brown to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am please to move the admission of Benjamin D. Brown, pro hac vice.

7. I respectfully submit a proposed order granting the admission of Benjamin D. Brown, pro hac vice, which is attached hereto as Exhibit A.

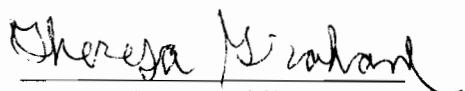
WHEREFORE it is respectfully requested that the motion to admit Benjamin D. Brown, pro hac vice, to represent Plaintiffs in the above captioned matter be granted.



Seth R. Gassman (SG-8116)

Sworn to before me this
11th day of July, 2007

TERESA A. GRAHAM
Notary Public, State of New York
No. 01GR5054854
Qualified in Bronx County
Commission Expires Jan. 29, 20



Theresa A. Graham
Notary Public

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

JOHN BOYD et al.,)
Plaintiffs,) Case No. 07-cv-3007
v.) [PROPOSED] ORDER FOR
AWB LIMITED and AWB (U.S.A.)) ADMISSION PRO HAC VICE
LIMITED,)
Defendants.)

)

Upon the motion of Seth R. Gassman, counsel for Plaintiffs in the above captioned case, and said sponsor attorney's affidavit in support,

IT IS HEREBY ORDERED that

Benjamin D. Brown
Cohen, Milstein, Hausfeld & Toll, PLLC
West Tower, Suite 500
1100 New York Avenue, NW
Washington, DC 20005
Tel: 202-408-4600
Fax: 202-408-4699
bbrown@cmht.com

is admitted to practice pro hac vice as counsel for Plaintiffs in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the clerk of the Court.

Dated: _____, 2007

Gerard E. Lynch
United States District Judge



THE STATE BAR OF CALIFORNIA

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

TELEPHONE: 888-800-3400

June 22, 2007

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, BENJAMIN DOYLE BROWN, #202545 was admitted to the practice of law in this state by the Supreme Court of California on September 29, 1999; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

Kath Lambert
Kath Lambert
Custodian of Membership Records



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D.C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

BENJAMIN D. BROWN

was on the 9th day of January, 2006

duly qualified and admitted as an attorney and counselor and entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on June 18, 2007.

GARLAND PINKSTON, JR., CLERK

By: *Shuey Corbin*
Deputy Clerk

CERTIFICATE OF SERVICE

I, SETH R. GASSMAN, certify that I served a true and correct copy of the foregoing Motion to Admit Counsel Pro Hac Vice by First Class Mail on this 11th day of July, 2007 upon the following counsel of record:

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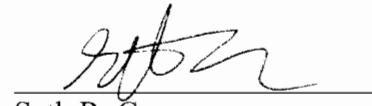
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*Counsel for Defendants AWB Limited and AWB
(U.S.A.) Limited*



Seth R. Gassman